of two lines of thought. The first considers damages like those sought in the principal case to be consequential; and so properly denies recovery unless the message itself discloses the details of the transaction sufficiently to put the consequences reasonably within the contemplation of the sending agent. *Primrose* v. *Western Union Telegraph Co.*, 154 U. S. 1; *Sanders* v. *Stuart*, 1 C. P. D. 326. *Cf. Hadley* v. *Baxendale*, 9 Exch. 341. Cases of the second class more properly regard the loss of the value of the information that should have been delivered as direct damages, but require, with varying degrees of exactitude, that the transaction be so disclosed that the damages may be said to result naturally from the breach of that kind of a contract. *True* v. *International Telegraph Co.*, 60 Me. 9; *Fererro* v. *Western Union Telegraph Co.*, 9 App. D. C. 455. *Cf. Cutting* v. *Grand Trunk Railway Co.*, 13 Allen (Mass.) 381. It is submitted, that this requirement is satisfied if the message shows itself to be of business importance, and that the few cases opposed to the principal case are correct in holding that a cipher message reasonably conveys such information. *Western Union Telegraph Co.* v. *Way*, 83 Ala. 542. *Contra, Candee* v. *Western Union Telegraph Co.*, 34 Wis. 471.

WILLS — TESTAMENTARY CAPACITY — DECLARATIONS OF ATTESTING WITNESS. — The contestants of a will offered evidence of declarations by a deceased attesting witness that the testator was of unsound mind when the will was made. *Held*, that the evidence is inadmissible. *Speer* v. *Speer*, 123 N. W. 176 (Ia.).

When evidence of a declaration is admitted under some exception to the hearsay rule, it may be shown by way of impeachment that the declarant made contradictory statements. *Carver* v. *United States*, 164 U. S. 694. By the weight of authority, proof of a deceased subscribing witness's signature is proof of a declaration that the document was properly executed. *Neely* v. *Neely*, 17 Pa. St. 227; *Townsend* v. *Townsend*, 9 Gill (Md.) 506. But a very respectable minority, including Baron Parke, treat such evidence merely as direct proof that the witness put his name there in a particular manner. *Stobart* v. *Dryden*, 1 M. & W. 615. Where, as in the principal case, this latter view is adopted, there is no declaration to be impeached by contradictory statements. But even if the attestation is a declaration, it is submitted that it does not declare that the testator was sane. See *Baxter* v. *Abbott*, 7 Gray (Mass.) 71. *Contra, Stevens* v. *Leonard*, 154 Ind. 67. The average man would probably be willing to witness a friend's will, although he did not believe that the friend had testamentary capacity. If, therefore, there was no declaration that the testator was sane, the evidence offered could not go in as impeaching such a declaration.

BOOK REVIEWS.

THE LEGISLATION OF THE EMPIRE. A Survey of the Legislative Enactments of the British Dominions from 1898 to 1907. Edited by C. E. A. Bedwell. In four volumes. London: Butterworth and Company; Philadelphia: Cromarty Law Book Company. 1909. pp. xxxv, 545; x, 482; x, 528; 231.

This valuable and interesting index to the legislation of Great Britain and of her colonies is the sort of book that is at once the despair and the envy of the American publicist. With all the extravagance at Washington, no money has ever been found to spend in compilations far more necessary of the statute law of the forty-six states, three territories, and the insular possessions of our Union. Such works can never have a popular sale large enough to justify the very great expense of publication. If the reviewer may be pardoned for alluding to his own digest, "American Statute Law," published in 1886, he would call attention to